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6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA

9 Plaintiff,

10 vs.

11 EUGENI STOYTCHIEV, et al.

12 Defendant.

CASE NO.: 2:11-CR-00434-LDG-GWF

13 **UNOPPOSED MOTION TO TRAVEL**  
14 **AND ORDER**

15 **COMES NOW**, Defendant EUGENI STOYTCHIEV (hereinafter "STOYTCHIEV") by  
16 and through counsel of record William H. Gamage, Esq. of Gamage & Gamage and hereby files  
17 this UNOPPOSED MOTION TO TRAVEL AND ORDER in the above titled matter. This  
18 Motion is made and based upon all papers and pleadings on file herein, the attached Memorandum  
19 of Points and Authorities, along with any oral argument deemed necessary by this Honorable  
20 Court.

21 DATED THIS 12th day of June, 2013.

22 **GAMAGE & GAMAGE**

23 **/s/ William H Gamage, Esq.**

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**MEMORANDUM OF POINTS AND AUTHORITIES**

Defendant STOYTCHEV hereby moves this Court to allow him to travel under the following circumstances while under the supervision of US Pretrial Services.

1. Defendant STOYTCHEV is currently released from custody on his own recognizance and is under the supervision of Pretrial Services Officer Terry Wheaton.

2. Defendant STOYTCHEV wishes to travel to San Francisco, California for the purposes of meeting with his parents and long time family friends. Defendant STOTCHEV will be driving and staying at the Days Inn Buelton-Solvang Hotel, 114 E. Highway 246, Beulton, CA 93427 from June 13, 2013 until June 14, 2013 and then at the Best Western Hotel, 4600 Clayton Road, Concord, CA 94521 from June 14, 2013 until June 17, 2013.

3. Defendant STOYTCHEV drive straight back to Las Vegas on the 17<sup>th</sup> of June arriving June 18, 2013.

4. Defendant Stoytchev will have his cellular telephone and be reachable at all times by Pretrial Services.

5. Assistant US Attorney (AUSA) Timothy Vasquez advised counsel to verbally confirm that Pretrial Services approved the travel request. AUSA Vasquez advised counsel that he would not oppose this Motion if pretrial services so approved the travel.

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1           6.       On or about June 12, 2013, Counsel telephoned Pretrial Services Officer Terry  
2 Wheaton who stated that he had no problem with Defendant Stoytchev traveling as described  
3 above.

4           Accordingly, Defendant STOYTCHEV now makes this unopposed Motion to allow  
5 Defendant STOYTCHEV to travel as described above.

6           DATED THIS 12th day of June, 2013.

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8                               **GAMAGE & GAMAGE**

9                               /s/ **William H Gamage, Esq.**

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17 *Attorney for Defendant Eugeni Stoytchev*

18           IT IS SO ORDERED THIS 17th day of June, 2013.

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20                              \_\_\_\_\_  
21 *Jerry A. Green*  
22 UNITED STATES MAGISTRATE JUDGE

23                               **CERTIFICATE OF SERVICE**

24           I hereby certify that the above and foregoing UNOPPOSED MOTION TO TRAVEL  
25 AND ORDER was served via the Court's electronic filing system on all counsel registered to this  
26 case.

27                               /s/ William H. Gamage  
28                              \_\_\_\_\_  
EMPLOYEE OF GAMAGE & GAMAGE